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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**DUNKIN' DONUTS FRANCHISING LLC,  
DD IP HOLDER LLC, and BASKIN-  
ROBBINS FRANCHISING LLC,  
Plaintiffs,**

**- vs. -**

**CLAUDIA III, LLC, et. al.**

**Defendants.**

**C.A. NO.: 14-CV-2293**

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT  
AGAINST DEFENDANTS**

Plaintiffs Dunkin' Donuts Franchising LLC, DD IP Holder LLC, and Baskin-Robbins Franchising LLC, by their counsel, move for summary judgment against Defendants on all counts of the complaint against Defendants, seeking permanent injunction to enjoin Defendants from holding themselves out as an authorized franchisee at 230 Route 313, #1, Perkasio, PA 18944. The basis of the motion is Defendant Claudia III, LLC has refused to report weekly sales, pay royalties and advertising fees, maintain the appearance of the restaurant, and the franchise agreement authorizing operation of the franchised location was terminated because of this material default and repudiation of the franchise relationship.

The motion is based upon the Certification of Gary Zullig and the Memorandum of Law.

Dated March 2, 2015

Respectfully submitted,

s/ Craig R. Tractenberg

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